

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

**ZANDER GROUP HOLDINGS INC. and
JEFFREY J. ZANDER,**

**Plaintiffs,
v.**

**KATZ, SAPPER & MILLER LLP; KSM
BUSINESS SERVICES INC.; and
ANDREW J. MANCHIR,**

Defendants.

Case No. 3:18-cv-653

**Judge Campbell
Mag. Judge Newbern**

**SUPPLEMENTAL DECLARATION OF RICHARD A. SIMPSON IN SUPPORT OF
DEFENDANT'S MOTION FOR ADMISSION *PRO HAC VICE***

This Declaration supplements my Declaration dated November 9, 2020 submitted in support of the motion to admit me *pro hac vice* for purposes of this case.

I declare under penalty of perjury that I am not, nor have I ever been, the subject of disciplinary or criminal proceedings, nor have I ever had a finding of contempt or a sanction against me under 28 U.S.C. § 1927.

Dated: November 12, 2020

/s/ Richard A. Simpson
Richard A. Simpson

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of November, 2020, a copy of the foregoing was sent via the Court's CM/ECF system to the following:

Eugene N. Bulso, Jr., Esq.
Paul J. Krog, Esq.
LEADER & BULSO, PLC
414 Union Street, Suite 1740
Nashville, TN 37219

/s/ Richard Glassman
RICHARD GLASSMAN